

ACHSA Testimony Before the LA County Blue Ribbon Commission on Child Protection
November 15, 2013

My name is Bruce Saltzer and I am the Executive Director of the Association of Community Human Service Agencies (ACHSA). Our association is composed of over 85 nonprofit, community based child welfare, juvenile justice, and community mental health agencies providing a full continuum of services throughout Los Angeles County, from residential treatment programs to prevention and family preservation programs. Our agencies benefit from the support and active involvement of more than 7500 community based Board members and volunteers, and our agencies have provided quality services to the neediest individuals, families, and communities of Los Angeles County since 1856. We would like to thank the Commission for this opportunity to speak.

ACHSA and our nonprofit agencies sincerely care about the vulnerable children and adolescents we are entrusted to serve, as well as the quality of care provided to them, which is reflected in numerous advocacy activities we have undertaken over the years. These include: 1) our initiation and drafting of Best Practice Guidelines for the Prevention of and Response to Allegations and Incidents of Abuse and Neglect for Group Homes and FFAs, which were finalized in collaboration with DCFS and Probation and are now in use; 2) our lead advocacy efforts to implement the MAT (or Multi-Disciplinary Assessment Team) program, DCFS and LA County's first comprehensive assessment process for foster youth going into out of home care; and 3) our recommendation to the County to establish its recently created Commercial Sexual Exploitation of Children Task Force.

Since we have a very brief time for remarks, I will highlight only several general themes and intertwined recommendations for the Commission. Theme number one – We believe that good intentions do not always lead to good policies or good practices. While all of us here today would like every youth growing up in LA County to be able to remain at home in an intact family, this simply isn't the reality we face. Moreover, we have no

choice but to approach system issues within the lens of that reality or our recommendations for change will be unsuccessful and can even be counterproductive.

Let me provide one example. In the new Wraparound contract RFSQ, DCFS has included the requirement that all Parent Partners must be parents of children who have received intensive services at the same level of Wraparound. By definition, Wraparound is one of the highest levels of service available so the number of children in this category is very limited. Accordingly, this new requirement, while well intended, would drastically reduce the already very limited pool of qualified Parent Partners, and even more importantly would have precluded our Wraparound agencies from hiring some of their most qualified parents who have made outstanding Parent Partners. Wraparound providers have estimated that at least half of the Parent Partners currently employed by their agencies would not meet this new requirement.

Theme number two – Providers' program related contractual requirements should be developed in a truly collaborative process with the Department which both: 1) includes back and forth dialogue, and 2) utilizes the expertise and experience of our community agencies. When a contract is issued, there should be no surprises, and if done collaboratively, should certainly contain no contract language which is counterproductive. The importance of this public/private nonprofit partnership to inform contracts was highlighted by Dean Flynn in her report back to the Commission on her interviews with frontline practitioners. The consequence of not following such an approach is to have resulting contract language which compromises providers' ability to most effectively and efficiently serve children and families.

Let me provide one example in addition to the Parent Partner example I gave above. When the Department issued its Emergency Shelter Care contract, the Statement of Work, which was developed without provider input, included the following provisions: 1) DCFS was allowed 30 days to provide the ESC provider with the child's background information on the youth, even though it is only a 30 day placement and such information should be provided when the child is placed or as soon thereafter as possible; 2) the CSW

was allowed 14 days to convene an initial case conference, although good practice would dictate the development of a case plan for children in emergency shelter care within the first 3 days; and 3) the ESC provider was told to have its psychologists prescribe medication, although that is outside their scope of practice.

Theme number three – DCFS and its leadership have an almost impossible job and will never be able to please everybody. While we have just articulated very significant legitimate concerns about the contract process and improved collaboration that have to be addressed for the benefit of the foster care system, we also recently submitted a Letter to the Editor of the Los Angeles Times which highlighted the fact that no matter what the Director does he gets attacked. While some people will always complain that the Department is detaining too many children, others will always complain that the Department is not removing enough children from their homes fast enough. And we all know that this philosophical pendulum swings back and forth over the years between these two poles depending on the latest news in the papers.

In this regard, we want to make it clear that the Association weighs in on the side of supporting the Director's focus on both common sense and safety first. This does not mean that we don't strongly support adequate funding for programs like Family Preservation for foster youth and their families to allow those youth to remain at home if at all possible, which we certainly do. What it does mean though is that if there is a judgment call required, and the facts are uncertain, we believe strongly that the Department should always err on the side of child safety and that safety certainly does deserve to be the Department's highest priority.

Our final theme, plain and simple – What we do as a child welfare system, and how we evaluate our performance, should never be based primarily on statistics and how things might look on paper. Rather, our system should always be judged by how we treat every individual child and family that requires our assistance, each of which has its own particular set of individualized strengths and needs. So it shouldn't really be about how many youth are in care or whether they are required to stay in care for one month, or six

months, or a year, but instead it should always be about did we best meet the needs of this particular foster youth and his or her family, and did we do what we needed to do to make him or her successful and productive.

Thank you very much for your consideration.